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Via email: James@JamesOlsenLaw.com

James W. Olsen, Esq.
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Re: EPA USA, Inc.'s information and items

James,

This letter outlines EPA USA's items and information we expect to be in Mr. Knap's care, possession, custody, or control. This list is not exclusive; EPA USA may supplement it as the transition continues. To be clear, we expect the return and subsequent removal of absolutely everything in Mr. Knap's possession or control that belongs to or relates to EPA USA. You and Mr. Knap can use this link to upload records directly to our firm's Box account.

<https://griffithbarbeepllc.app.box.com/f/78692d8a52e2484e93088aced08557c0>

1. Continued Cooperation

Even after all of EPA's property is returned and Mr. Knap is fully disengaged from the company, EPA may occasionally need Mr. Knap's cooperation to access accounts or provide information. Please confirm that Mr. Knap will continue to cooperate, after reasonable notice from EPA, in issues and tasks related to transitioning EPA from his management.

2. Return

EPA requests that Mr. Knap return, or upload to the Box link and subsequently remove, the following items and information in his care, possession, custody, or control:

- 2.1.** All EPA USA property, including all records, documents, files, forms, proprietary information, bank records, accounting documentation, and other information concerning EPA USA;
- 2.2.** All EPA USA passwords, including all passwords, logins, access codes, and other information used to access or use any systems, equipment, software, accounts, or website domains that were established for or on behalf of EPA USA;
- 2.3.** All EPA USA corporate filings;
- 2.4.** EPA USA's Articles of Incorporation, including any amendments to or restatements;
- 2.5.** EPA USA's Bylaws, including any amendments to or restatements;

- 2.6. All minutes of EPA USA's meetings;
- 2.7. All resolutions and written consents of the shareholders or directors of EPA USA;
- 2.8. All EPA USA agreements, including powers of attorney, engagement agreements with law firms, employment or independent contractor agreements, nondisclosure agreements, or any other written agreements, including any amendments to or restatements;
- 2.9. EPA USA's federal, state, and local tax information and tax returns for 2019-present;
- 2.10. All financial statements of EPA USA, including the balance sheets and profit and loss statements, from EPA USA's formation to the present in a form and manner that fairly and accurately present the assets, liabilities, and financial position of EPA USA;
- 2.11. The general ledgers of EPA USA, as of a recent date, in a form and manner that fairly and accurately presents the assets, liabilities, and financial position of EPA USA;
- 2.12. All evidence of any EPA USA indebtedness, including but not limited to any document, instrument, or communication that evidences or contemplates (i) the loaning or borrowing of any funds, (ii) all leases (real property, vehicles or otherwise), or (iii) capitalized leases on behalf of, or for the benefit of, EPA USA;
- 2.13. All of EPA USA's insurance policies, including, but not limited to, any casualty insurance policies;
- 2.14. All debt portfolios purchased with EPA USA funds or in EPA USA's name, including but not limited to the debt portfolios identified in Mr. Knap's May 7, 2024 Affidavit paragraph 15;
- 2.15. All receipts reflecting anything purchased with EPA USA funds or in EPA USA's name;
- 2.16. All employee files and records;
- 2.17. All payroll records;
- 2.18. All phone number and phone line provider records;
- 2.19. All website hosting records;
- 2.20. All emails to and from EPA USA email accounts, from 2019 to present;
- 2.21. Records of all third-party service providers for EPA USA;
- 2.22. Records of all "freelance" operators, technology consultants, forensic consultants, and the like used by EPA USA;
- 2.23. Records of VPN accounts or purchases;
- 2.24. All business contact information and lists; and
- 2.25. All debt-collecting licenses, applications for debt-collecting licenses, notices relating to debt-collecting licenses, and information required to obtain or renew debt-collecting licenses.

3. Identify

EPA requests that Mr. Knap provide the following information in a digital format of his choosing (for example, a Word document, PDF, or email):

- 3.1. Identify all EPA USA, Inc. bank accounts, past and present, including bank name, account number, and all other necessary identifying information;
- 3.2. Administrative login credentials for all EPA USA computers;
- 3.3. Administrative login credentials for all EPA USA accounts of any kind;
- 3.4. Administrative login credentials for EPA USA's website and email servers;
- 3.5. Identify all debt portfolios purchased with EPA USA funds or in EPA USA's name;
- 3.6. Identify all furniture, fixtures, equipment, and inventory held by EPA USA;
- 3.7. Identify all past and current employees, including their contact information;
- 3.8. Identify all independent contractors retained since 2019, including their contact information; and
- 3.9. Identify all phone number/phone line providers and account information.

4. Cooperate

EPA requests that Mr. Knap cooperate in the following ways:

- 4.1. Assist EPA USA, Inc. in accessing all bank accounts;
- 4.2. Introduce EPA USA to its current accountant/CPA;
- 4.3. Remove himself and his ability to access all bank accounts, internet accounts, social media accounts, and utilities;
- 4.4. Not hold out as being related to EPA USA in any forum, including physical as well as on the internet and in social media; and
- 4.5. After reasonable notice from EPA, continue to cooperate with issues and tasks related to transitioning EPA from under his management.

Thank you for your cooperation and assistance with this matter. As always, please don't hesitate to contact me with any questions.

Sincerely,



Ashley Menage

cc: Natalie Ponomarou (*via email*)
Martin Benko (*via email*)